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16 Attorneys for Defendant

17  
18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 RADIAN, INTERNATIONAL, LLC,

Case No.: C 04-4537 SC

22 Plaintiff,

**STIPULATION FOR ORDER STAYING  
DISCOVERY**

23 v.

24 ALPINA INSURANCE COMPANY,

25 Defendant.

26  
27 IT IS HEREBY STIPULATED, pursuant to Local Rule 7-12, by and between the  
28 undersigned parties that all discovery in the above captioned action is hereby stayed until the  
June 24, 2005 hearing before the Court on Defendant's Motions to Dismiss and to Stay  
Discovery. This stay applies to any and all discovery including, but not limited to, Radian's  
Notice of Deposition to Zurich Insurance Company Pursuant to Rule 30(b)(6), the attached

**Joint Stipulation for Order Staying Discovery**  
**CO4-4537 SC**

1 Requests for Production of Documents, Records and Other Materials, and Radian's First Set  
2 of Interrogatories to Zurich Insurance Company ("Pending Discovery").

3 Defendant reserves any and all rights to argue that the Motion to Stay All Discovery  
4 until the Court rules on Defendants' Motion to Dismiss should be granted and plaintiff  
5 reserves the right to oppose that Motion.  
6

7 This Stipulation does not waive any objections that Defendant Alpina Insurance  
8 Company or Zurich Insurance Company have to Radian's Pending Discovery and all such  
9 objections by Alpina Insurance Company or Zurich Insurance Company are fully preserved.  
10

11 Dated this 6th day of June, 2005

12  
13 BY: 

14 Peter K. Rosen (Bar No. 82725)  
15 **LATHAM & WATKINS**  
16 633 West Fifth Street, Suite 4000  
17 Los Angeles, CA 90071-2007  
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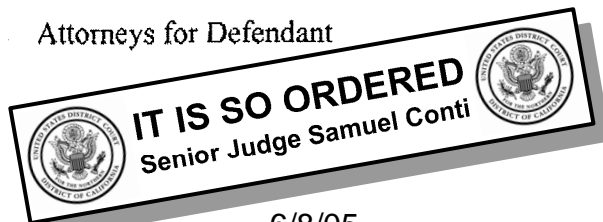
26 Attorneys For Plaintiff

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13 By: 

14 Richard Hoffman (Bar No. 076799)  
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Attorneys for Defendant



6/8/05

1 PURSUANT TO STIPULATION, IT IS SO ORDERED,  
2

3 \_\_\_\_\_  
U.S. District Judge  
4

5 Date: \_\_\_\_\_  
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PROOF OF SERVICE

1 **CASE NAME: Radian International, LLC v. Alpina Insurance Company.**  
2 **COURT: U.S.D.C., N.D. of CA, San Francisco Division**  
3 **CASE NO.: C04-4537 SC**  
4 **NP FILE: 082252.550218**

5 I, the undersigned, certify that I am employed in the City and County of San Francisco,  
6 California; that I am over the age of eighteen years and not a party to the within action; and that my  
7 business address is Two Embarcadero Center, Suite 2700, San Francisco, CA 94111-3996. On June  
8 7, 2005, I served the following document(s):

9 **1. Stipulation for Order Staying Discovery**

10 on the parties stated below, through their attorneys of record, by placing true copies thereof in sealed  
11 envelopes addressed as shown below by the following means of service:

12 X : By Facsimile — From facsimile number (415) 984-8300, I caused each such document to be  
13 transmitted by facsimile machine, to the parties and numbers listed below, pursuant to Rule 2008.  
14 The facsimile machine I used complied with Rule 2003(3) and no error was reported by the machine.  
15 Pursuant to Rule 2008(e)(4), I caused the machine to print a transmission record of the transmission,  
16 a copy of which is attached to the original of this declaration.

17 Addressee(s)

18 **Peter K. Rosen, Esq.**  
19 **Latham & Watkins LLP**  
20 **633 West 5<sup>th</sup> Street, Suite 4000**  
21 **Los Angeles, CA 90071-2007**  
22 **Telephone: (213) 485-1234**  
23 **Facsimile: (213) 891-8763**

24 I declare under penalty of perjury that the foregoing is true and correct. Executed on June 7,  
25 2005, at San Francisco, California.

26 

27 

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Carolyn Wilson